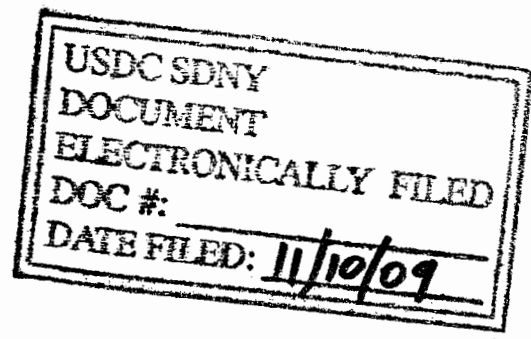


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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



DALIAN TIGER SHIPPING LIMITED,

Plaintiff,

-against-

DANZHOU YONGHANG STAINLESS  
STEEL CO. LTD.,

Defendant.

08 Civ. 11025 (DAB)

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE THAT**, upon the accompanying declaration of Jack A. Greenbaum, and Plaintiff's Memorandum of Law, dated October 23, 2009, Plaintiff DALIAN TIGER SHIPPING LIMITED will move this Court before the Honorable Deborah A. Batts, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York at a date to be set by the Court for:

- a. Reconsideration of the Court's Order dated November 2, 2009, pursuant to F. R. Civ. P. Rule 60(b)(1) and (6) and Local Rule 6.3, and issuance of an Order maintaining the maritime attachment of funds previously restrained in this action, or alternatively
- b. Leave to amend the Complaint, pursuant to F. R. Civ. P. Rule 15, and
- c. Issuance of an Order of Attachment pursuant to F. R. Civ. P. Rule 64 and N. Y. C.P.L.R. Article 62 and

- d. Such other and further relief as the Court deems just and proper.

**SO ORDERED**

*Deborah A. Batts*  
DEBORAH A. BATTS  
UNITED STATES DISTRICT JUDGE  
11/10/09